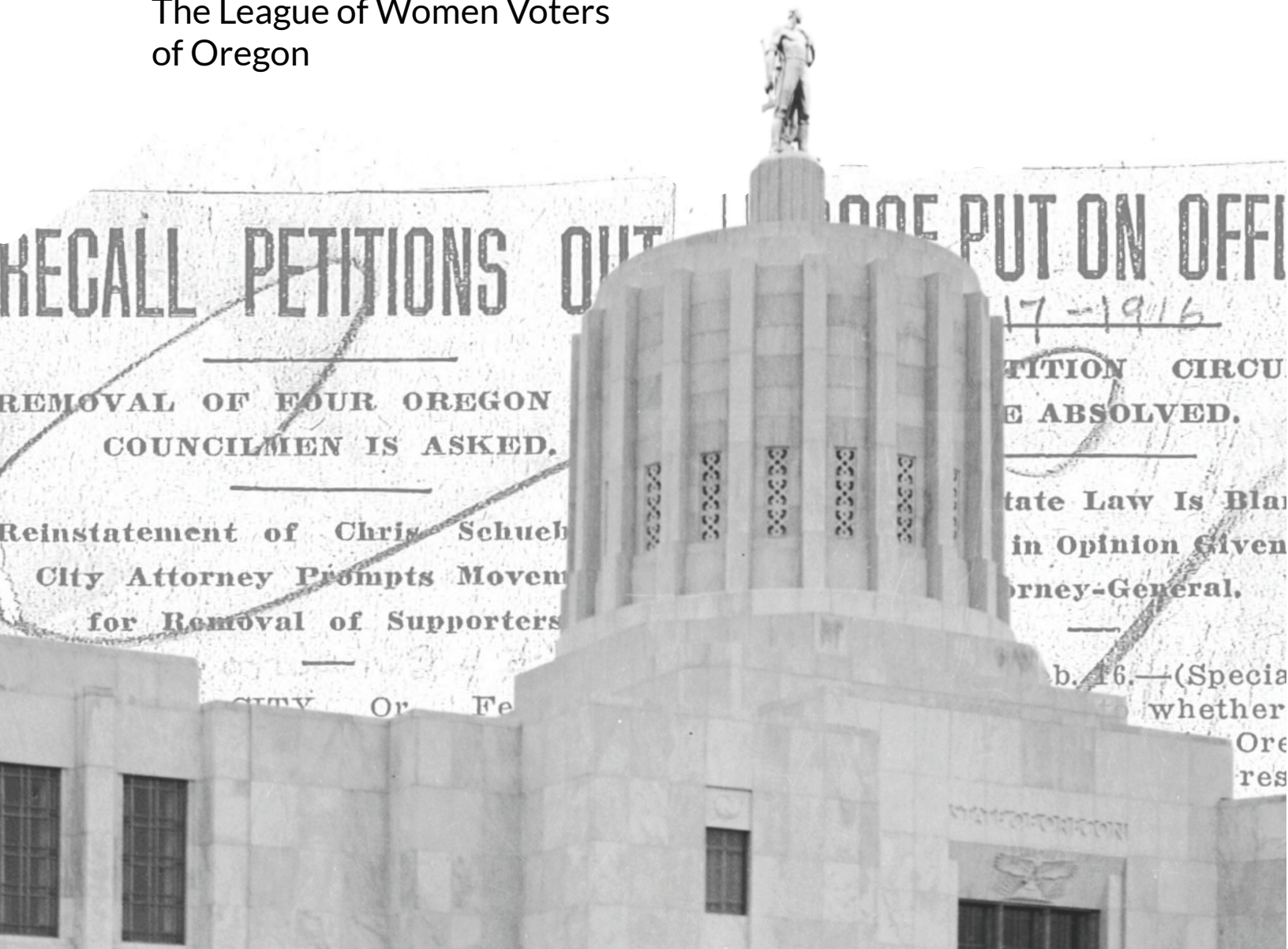


# ASSESSING THE RECALL PROCESS IN OREGON

## A STUDY BY

The League of Women Voters  
of Oregon



# Executive Summary

## Assessing the Recall Process In Oregon

### What is recall?

Oregon voters in 1908 amended the state Constitution to allow for recall of public officials. A recall election enables voters to remove an elected official from office before the official's term has ended.

A total of 19 states now permit recall of state officials, while 39 states allow recall of public officials at the local level. Procedures differ greatly across the country. This study examines Oregon law and process, as well as practices in other states where recall is permitted.

Voters and the courts have modified Oregon's recall process several times since 1908 to clarify who is subject to recall, the number of valid signatures required to qualify a recall petition, procedures for filling vacated seats, and the role and methods of elections officials overseeing the recall process. [Article II, Section 18, of the Oregon Constitution](#) establishes requirements.

### Why examine the recall?

The League of Women Voters of Oregon conducts voter education and pro-democracy advocacy, and believes it is critical to understand the potential consequences of the recall process as part of our elections framework. Considering the growing use of the recall, LWVOR decided in 2023 to examine the process in detail to consider updating its position.

### What are some of the key issues?

- Elections offices have finite resources. Recall elections can pose unexpected expenses that challenge local governments.
- Recall election procedures in Oregon have tight timelines. The Oregon Constitution mandates that recall elections be scheduled to occur no later than 35 days after the last day for an elected official to resign in response to a successful recall petition drive—a timeline feature that:
  - appears to conflict with the requirement that elections officials mail overseas and uniformed-service ballots 45 days before an election;
  - may catch uninformed voters and those who are not yet registered to vote by surprise;
  - can make it difficult for elections officials to produce a voters pamphlet, as well as officials, advocates, and opponents to provide public education materials; and
  - can conflict with the four statutorily authorized election dates. ([ORS 171.185](#))
- Filling seats vacated by recall elections varies widely for different offices. Many voters may not realize how appointments are made to fill vacancies or that voters themselves usually do not select immediate, or interim, successors.
- Oregon does not require specific grounds for filing a recall petition, but a petitioner must state the reasons for demanding the recall and provide factual information.
- The recall, just like other types of elections, raises important questions about the role of elected officials and their relationship with voters; the influence of money in elections; impacts of gerrymandering; advantages of incumbency; corrosive effects of harassment on elections officials, officeholders, and civic advocates; and equity.

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## Introduction

Community members often look to the League for information about issues that emerge during elections. Does the existing position of the League of Women Voters of Oregon (LWVOR) on recall adequately support voter education on the process and procedures—generally and during specific recall elections?

In 2022, several Eugene community members contacted representatives with the League of Women Voters of Lane County (LWVLC) for guidance on a recall effort underway. LWVLC understood that taking a position on recalling a particular officeholder could conflict with the League’s role as a nonpartisan organization that neither supports nor opposes candidates and political parties.

The most recent study leading to the LWVOR position on Initiative, Referendum and Recall was adopted in 1988, with revisions in 1996 and an educational update in 2001. However, that work did not look at recall itself, instead examining only the referendum and initiative processes. In plain language, the LWVOR position states: “The League of Women Voters of Oregon supports the recall process as provided in the Oregon Constitution.” See LWVOR Policy and Position Statements: Governance, in Appendix 1. (LWVOR Policy and Position Statements, Governance, Initiative, Referendum and Recall Position, 1988, 1996, 2001)

Recent recall attempts in the state have renewed attention on the process: Who is subject to recalls? How do recalls work? What laws and procedures guide this type of election? How well do these efforts engage and inform voters for fair, accessible elections?

The LWVOR Board agreed it would be helpful for members to better understand the recall process, including its potential benefits,

drawbacks, and consequences. The Board recommended a study on the recall process in the Program approved by delegates to the May 2023 LWVOR convention.

This report summarizes research, interviews, analysis, and discussions about the recall process in Oregon and considerations for reform that could help respond to challenges. As a state study, this report has benefited greatly from involvement by League members throughout Oregon.

## What is Recall?

A recall election enables voters to remove an elected official from office before the official’s term has ended. Nineteen states permit recall of state officials, while 39 states allow recall of public officials at the local level. However, procedures differ across the country. In Oregon, the language in Article II, Section 18, of the Oregon Constitution is clear: Every elected state and local official in Oregon is subject to recall.

**“We need more public education about the recall process.”**

**Dena Dawson, Lane County Clerk**

RECALL PETITIONS OUT

# Oregon's Current Recall Process

The Oregon Constitution allows any non-federal public officeholder, appointed or elected, to be recalled from office before the term has expired. A prospective recall petition may be filed only after the public officeholder has served at least six months of their current term of office, with an exception for an elected State Senator or State Representative. For these officials, a prospective recall petition may be filed after the fifth day from the beginning of the first legislative session after the legislator's most recent election to that seat.

Among those subject to recall in Oregon:

## State Officials Subject to Recall

- Governor
- Secretary of State
- State Treasurer
- Attorney General
- State Senator
- State Representative
- Commissioner of the Bureau of Labor and Industries (Labor Commissioner)
- Judge (Supreme Court, Court of Appeals, Tax Court, Circuit Court)
- District Attorney

## Local Officials Subject to Recall

- County Commissioner
- County Judge who exercises judicial functions
- Justice of the Peace
- County Clerk
- County Assessor
- County Treasurer
- Sheriff
- Elected city positions such as city councils

- Elected special district positions such as school boards, water districts and others

Note: A few of these positions may not be subject to recall depending on how the seat is filled in a particular jurisdiction—for instance, if the person is hired as an employee.

A recall effort must have one chief petitioner who is a registered voter in the jurisdiction where the official is elected or appointed. Before gathering signatures to place a recall on the ballot, the chief petitioner must file a prospective petition with the appropriate elections official. Once a petition is approved, signatures are due no later than 5 pm, 90 days after the petition is filed with the elections official. Only voters registered in the elected official's jurisdiction may sign a recall petition.

The required number of valid signatures is 15 percent of the votes cast for governor in the elected official's district during the most recent previous gubernatorial election at which a candidate for Governor was elected to a full term, unless the jurisdiction has other rules. Jurisdictions can cross county lines, and all votes cast must be considered in calculating the signature requirement.

For the purpose of calculation, votes cast include write-in votes, but not overvotes or undervotes. An undervote occurs when someone does not cast a vote on a ballot choice question, whether in a candidate's race or on a measure. This can be intentional, for example as an abstention or protest vote, or an unintended oversight. An undervote does not cancel out the person's ballot. An overvote, on the other hand, means the voter has voted too many times in one race or on one measure—which spoils the ballot for that item.

In contrast, the number of signatures required for citizen petitioners to qualify an initiative or referendum for the Oregon ballot is lower:



## Oregon Recall Timeline: 1908

An amendment to the Oregon Constitution allows for recall of public officials. Amendment approved by 62% of voters (all men). (*Image source: Oregon Historic Photographs Collections, see page 50*)

**Constitutional initiative**—Valid signatures totaling at least eight percent of the total votes cast for governor at the last election is required.

**Statutory initiative**—Valid signatures totaling at least six percent of the total votes cast for governor at the last election is required.

**Referendum petition**—Valid signatures totaling at least four percent of the total votes cast for governor at the last election is required.

Additionally, petitioners have approximately two years to circulate petitions.

The chief petitioner or an authorized agent for a proposed recall election must submit signature sheets for verification by the appropriate elections official. As noted in the [Recall Manual](#) produced by the Oregon

Secretary of State: “Signature verification will only be conducted if the elections official determines the petition signature sheets accepted for verification contain a number of unverified signatures equal to or greater than the required number of signatures.” What this means in practice is that recall advocates must submit a number larger than required to assure a sufficient number of verifiable signatures.

Once a completed recall petition is certified, the elected official may resign within five days or choose to remain in office pending election results. The latter choice requires that the officeholder submit a statement of justification. The official’s statement and material from the chief petitioner are printed on the ballot. If the official does not resign, a recall election will be scheduled to occur no later than the 35th day after the last day for the elected official to resign. There is no rule stating on what day of the week a recall

election must be held. A successful recall election triggers a separate process for filling the vacated seat. ([Oregon Secretary of State Recall Manual, Elections Division, revised January 2024](#))

Oregon’s elections calendar features four standard elections: the second Tuesday in March; third Tuesday in May; fourth Tuesday in August; and first Tuesday after the first Monday in November. ([ORS 171.185](#))

**“Maybe it’s the nature of politics or maybe it’s a sign of the times, ...but it seems like recalls may transition from an effort of last resort to one of first resort.”**

**Michael Dunne <sup>1</sup>**



During odd years, the May Special Election is the only election with candidate positions scheduled. During even years, the May Primary and November General Election are the only elections with candidate positions scheduled. Ballot Measure referrals can be placed on the ballot during any of the four scheduled election dates.

## History of Recall in Oregon

### Early History & Adoption of Constitutional Amendment

Oregon voters overwhelmingly approved a ballot measure referred by the Oregon Legislature in 1902, creating the state’s initiative and referendum process. Reforms continued in 1904, when voters enacted the direct primary. Then, in 1908, Oregon voters amended the state Constitution to allow for recall of public officials. Known as “the Oregon System,” these empowerment efforts were led by the Direct Legislation League, a group founded in 1898 and led by William S. U’Ren. ([Legislative Research Office, Oregon Legislature, 1975](#); [Oregon Blue Book, 2023](#))

Removing obstacles to voter participation in government decision-making was a major goal for the Progressive Movement in the early 20th century. Although the movement pursued several reform goals, it did not necessarily seek broad-based participation in governance. Some of the era’s leaders also promoted racist and xenophobic practices and restrictions. ([Southern, 2006](#); [Foundation for Economic Education, 2019](#))

Oregon was one of the first states to adopt the recall process. The measure passed

<sup>1</sup> [Dunne, Michael](#), Oregon Public Broadcasting. (2023, September 22). The attempted recall of Representative Paul Holvey. Oregon on the Record broadcast.





## Oregon Recall Timeline: 1917

Legislators include School Board members as officials who can be recalled. Between 1908 - 1915, 17 recall elections are held. *(Image source: Willamette Heritage Center, see page 50)*

with 62 percent of the vote—all men, as this occurred before women secured the vote in Oregon. This became Section 18, Article II, of the Oregon Constitution. Among the major provisions of the amendment, when originally adopted, were:

- 1) Every public officer in Oregon is subject to recall.
- 2) The recall petition must state the reasons for recall and contain the signatures of elected voters equivalent to 25 percent of the total vote for the Supreme Court Justice in the last election in the district involved.
- 3) If the recall petition is successfully filed, then the officer facing recall has five days in which to resign or will face a recall election within 20 days.
- 4) If the officer resigns, then the vacancy will

be filled as required by law. However, should the recall election occur, any individual, including the officer against whom the recall was filed, may run for the office. The matter of recall will be decided by whoever receives the highest number of votes. The winner of the election will complete the term of office that was involved in the recall.

- 5) Additional legislation to aid in the operation of the amendment could be provided by the legislature.

## Significant Recall Activity, the Early Days

Between 1908 and 1915, a total of 17 recall elections were held in Oregon involving 34 elected officials. As a result of these elections, 25 officials were recalled and nine were retained in office. Many more recalls were attempted during this period but failed to

reach the ballot for various reasons. Early recall elections targeted mayors, members of city councils and district boards, district attorneys, county judges, and a state senator. In his 1912 book, "[The Operation of The Initiative, Referendum, and Recall in Oregon](#)," James D. Barnett wrote that the attempt to recall one city council member occurred when he ceased residing in his ward, "...although the real cause was probably that he voted to license a hotel bar, and there was hope of electing as his successor one who would favor a 'dry' town." Attempts were made to recall mayors for failing to enforce ordinances against vice, and Barnett noted that one effort to remove a school director for action on a building location also hinged on retaining "...a teacher who had dismissed some students for disorderly conduct (the father of one of these students managed the circulation of the recall petition)."

Those first years of recall attempts faced legal challenges until, in 1914, the Oregon Supreme Court ruled that the constitutional amendment approved by voters was "self-executing," requiring no additional legislation. The Oregon Legislature in 1917 nevertheless further defined the constitutional provisions to allow recall of elected school board members.

## Filling Vacated Seats Proved Challenging

Another issue in Oregon's early years with recalls was the selection of a replacement should an election prove successful. Recall elections initially operated much like a primary election—those eligible could enter the race for the contested seat, alongside the elected official who was the subject of recall. This meant that officials facing recall would only lose their seats if outpolled by others on the same ballot. This too became a matter for the Oregon Supreme Court which, in 1914, determined that the recall itself was

a question distinct from who should fill the seat. The result of the court ruling was that voters would weigh in on the recall question while simultaneously considering candidates for filling a seat should it become vacated. However, even this proved to be a temporary fix. After all, though the questions were separate on the ballot, the incumbent facing recall could run for the seat at the same time.

A constitutional amendment approved in 1926 resolved the situation by clarifying that only the recall question would appear on the ballot; determining a replacement would be handled according to statutory provisions for filling vacant seats.

## Rationale for Recalls Subject to Debate

An issue noted in the early 20th century persists to this day: Should reasons cited for a proposed recall be limited in any way? Recall history author James D. Barnett, who once headed the University of Oregon's political science department, suggested that personal rather than policy-related reasons appeared to drive numerous recall attempts. While Barnett suggested that "misfeasance" or "malfeasance in office" should be the only grounds for seeking recall, advocates found no appropriate alternative that wouldn't overly curb voter rights.

## Early Legislative Action on Recalls

The 1923 Oregon Legislature enacted a law providing criminal penalties for illegal actions related to circulating and filing initiative, referendum, and recall petitions. Such illegal actions included extortion, making false statements, and knowingly obtaining false signatures.



## Oregon Recall Timeline: 1926

Constitutional Amendment to only place recall question on ballot and candidate replacement to be handled by statutory provisions. *(Image source: Willamette Heritage Center, see page 50)*

The 1933 Oregon Legislature required that recall proponents file expenditure information. Additionally, the Legislature restricted what had been an open-ended period for gathering signatures, resulting in a 90-day window for circulation and filing that is still in place today. The 1933 law also directed county clerks to verify signatures on a daily basis and complete this step within that 90-day period.

## Fast-forward to the 1970s

Aside from minor technical revisions in 1957, recall law and procedures remained largely the same until 1973. At that time, the Oregon Legislature amended the law to require that all recall petitions be verified by the Oregon Secretary of State using a statistical sampling technique, a chore that had to be completed within 24 hours following the 90-day filing period.

In 1975, the Legislature revisited the verification process, requiring the statistical sampling only for petitions requiring more than 50,000 signatures. Oregon Attorney General Lee Johnson also clarified that local county clerks still were obligated to verify signatures on the “smaller” petitions.

What prompted the Oregon Legislature’s research arm to consider recall elections in the mid-1970s? The Legislative Research Office, which serves the Legislature, in 1975 studied the recall, concluding: “An examination of present-day usage of the recall would indicate that it is becoming an increasingly popular tool to remove officials from office.”

## Another Constitutional Amendment, 1984

Oregon voters found a diverse set of measures on their Nov. 6, 1984, ballot—from statutory

and constitutional questions for a state lottery to property tax and capital punishment items. That ballot also contained Measure 1: “Shall a recall election be required upon petition of fifteen percent of the gubernatorial electors in a public officer’s district?”

The 1983 Oregon Legislature sought voter approval to amend the Oregon Constitution, changing the petition requirement from (a) 25 percent of the number of legal voters who voted in the public officer’s district at the preceding election for Supreme Court Justice to (b) 15 percent of electors in a district based upon the most recent election for Oregon Governor. Measure 1’s adoption also would increase from 20 to 35 the number of days between the last day on which the public officer could resign voluntarily and the date of the election.

Why did legislators want to change the formula for petition signatures? They argued it would provide greater stability and predictability. The number, or percentage, of voters casting ballots in the Governor’s race tended to be more constant, with bigger swings in Oregon Supreme Court justice elections, especially for contested races. In 1980, for example, a contested race for the Oregon Supreme Court changed the recall signature requirement in Multnomah County—from 27,496 in one year to 54,305 the year after. ([Oregon Voters Pamphlet, 1984](#))

## Basic Elements of Recall Laws & Process

### Contrasting Oregon with Other States

Recall laws and processes vary widely across the United States, from state to state and from one jurisdiction to the next. The charts beginning at page 16 and [The Book of the States](#) from the Council of State Governments

both outline procedural elements in fine-grained detail. The discussion below describes how these basic elements work in several, but not all, states and the District of Columbia.

## Officials Subject to Recall

In [Oregon](#), all elected state and local officials are subject to recall. This is not the case for all states and jurisdictions permitting use of the recall. Constitutional provisions, statutes, and local charters and ordinances must specify which officials may be recalled.

**Alaska.** While most elected officials are subject to recall, [Alaska](#) exempts state judicial officers.

**Washington.** The state of [Washington](#) also exempts judges from recall elections.

**Nevada.** Nevada exempts judges, but Nevada’s exemption rests on a [court case](#) rather than constitution or statute.

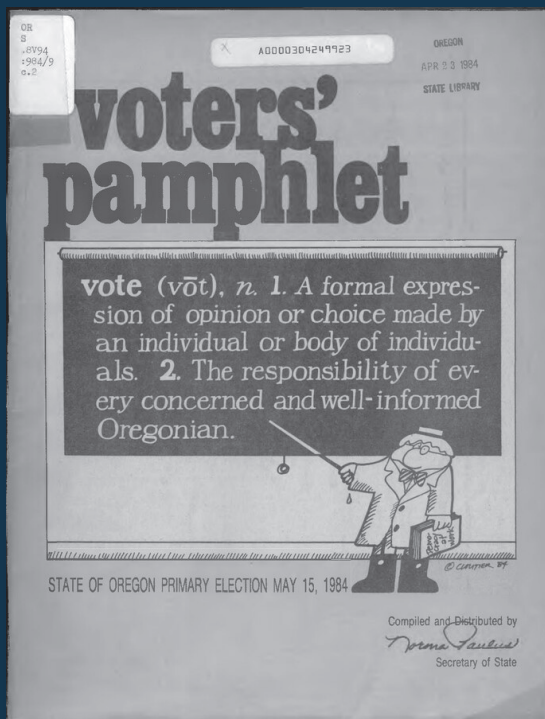
**Minnesota.** In [Minnesota](#), state officials are subject to recall but, locally, only those holding countywide offices may be recalled.

## Grounds for Recall

In Oregon and a number of other states, there are no limits on grounds. Recall proponents must provide a reason before proceeding with a recall petition, and there can be severe legal consequences for filing false information, but constitutions and laws do not prescribe specific grounds.

Some states limit recalls to specific grounds, among them:

**Alaska.** In [Alaska](#), recall proponents must make the case that the targeted state official has demonstrated: (1) lack of fitness, (2) incompetence, (3) neglect of duties, or (4) corruption; and that the local official has



## Oregon Primary Voters' Pamphlet 1984

A contested race for the Oregon Supreme Court changed the recall signature requirement in Multnomah County—from 27,496 in one year to 54,305 the year after.

*(Oregon Voters' Pamphlet, 1984)*

shown misconduct in office, incompetence, or failure to perform prescribed duties.

**Minnesota.** In [Minnesota](#), the required grounds for seeking recall are malfeasance, nonfeasance or serious crime. Malfeasance means a state official acted unlawfully in their duties as a state official. Nonfeasance means a state official failed to perform their duties. Serious crime means that the official committed a gross misdemeanor or felony. Failure to prove the official has committed one of these acts means the recall proposal cannot qualify for the ballot.

**Montana.** In [Montana](#), physical or mental lack of fitness, incompetence, violation of the oath of office, official misconduct, or conviction of a felony offense are the only grounds for recall. A person may not be recalled for performing a mandatory duty of the office that the person holds or for not performing any act that,

if performed, would subject the person to prosecution for official misconduct.

## Timing

In states and jurisdictions where recalls are permitted, laws define when petitions may be filed, the length of time for circulating a petition for signatures, length of time that elections officials are allowed for verifying signatures, and when elections must be held. Many states also limit the periods during which an office holder may be removed by recall.

**Oregon.** In [Oregon](#), elected officials must serve for at least six months in a single term before being subject to a recall. An exception exists for state legislators; a prospective petition may be filed for a state senator or representative any time after the fifth day of the first legislative session of their current term of office.

**New Jersey.** In [New Jersey](#), however, for local and state officials, recalls don't apply until after the first year of the term in which the incumbent was elected—and the process cannot begin until 50 days before completion of that first year in office.

**Rhode Island.** In [Rhode Island](#), recalls cannot be initiated during the last year of an individual's term of office.

## Other Procedural Matters

State elections directors, county clerks, and city recorders and clerks often oversee the recall process, from handling initial inquiries to verifying petition signatures and conducting elections. Some states and jurisdictions add other layers.

**District of Columbia.** In [Washington, D.C.](#), the Board of Election and Ethics must approve the recall petition before circulation.

**Michigan.** The state of [Michigan](#) requires that a hearing be held by the appropriate board, which for local officials would be the board of county commissioners, to determine if the basis for a proposed recall is “factual” and “clear.”

**Minnesota.** In [Minnesota](#), the proposed recall petition specifying grounds must be submitted to the Secretary of State. For a statewide office, the [petition](#) is sent to the Minnesota Supreme Court, which must approve for circulation after review by a “special master” and a public hearing. If the court ultimately approves the petition, advocates have up to 90 days to obtain the signatures of at least 25 percent of the number of voters who voted for that office in the last election.

Another critical piece of the process are the rules guiding who may circulate and sign a recall petition, the number of valid signatures

needed to qualify the petition, and the length of time during which signatures must be obtained and submitted. Although persons living outside the district may participate in a recall election through advocacy efforts, recall laws generally require that chief petitioners and those signing a recall petition be registered voters residing in the district represented by the targeted official.

**Oregon.** In [Oregon](#), anyone can collect signatures. These persons need not be registered voters or Oregon residents. However, extra steps are needed to verify their signatures.

**Washington.** Although Oregon restricts the petition process to 90 days, in [Washington](#), petitions may circulate for up to 270 days for statewide officeholders, 180 for others. The number of valid signatures required to [qualify a petition](#) ranges from 25 to 35 percent, depending on the office, of the total number of votes cast for all candidates for the office to which the officer whose recall is demanded was elected at the preceding election

**Nevada.** In [Nevada](#), only registered voters who actually voted in the previous election for the official under consideration for recall are eligible to sign the petition, a change to state law made by the 2015 Nevada Legislature intended to conform with a Nevada Supreme Court ruling.

## Election Details and Succession

**Oregon.** In Oregon, a seat vacated by resignation, a successful recall election or other action will result in a process that typically includes interim appointment of an officeholder until voters can choose the candidate to fill the seat at a future election.

**California.** For [California](#) recall attempts, the appropriate governing body must call for an election after certifying the petition, and the election itself occurs within 88 to 125 days—unless there is a regularly scheduled election within 180 days, in which case, the recall can be combined. For state-level offices, California uses a form of what is called a simultaneous election, in which the recall ballot includes the names of other candidates who have filed for consideration in the event voters simultaneously approve the recall.

To summarize, the recall vote may involve a yes/no vote on an elected official’s removal, a contested vote between that official and one or more challengers, or a yes/no vote on the official and a vote to select a replacement if the official loses the yes/no vote.

## Two Other State Leagues on Recall

### Michigan

Most Leagues do not have explicit positions on the recall. Michigan voters, like Oregon’s, enacted the recall in 1908. The [League of Women Voters of Michigan](#) has adopted the following position:

“The principles of initiative, referendum, and recall. Requirements for petitions such as the number of signatures and restrictions on the process of gathering signatures should be sufficient to prevent frivolous proposals, but not so high as to discourage grassroots efforts to initiate legislation, to amend the constitution or to recall our elected officials.”

### Minnesota

Recalls are more limited in Minnesota, both by office and in the requirement of particular grounds. The [LWV of Minnesota](#) opposes

recall of members of the Legislature and state constitutional officers, and supports strict procedural limits on any process of initiative, referendum or recall.

## Detailed Comparisons Across States

### Charts: Recall Provisions

Given the wide range of election procedures across the United States, it is not surprising that recall elections also showcase multiple and diverse practices and systems. The following charts provide an overview for states in which recall has been enacted for state-level officials. These states, along with Oregon, are Alaska, Arizona, California, Colorado, Georgia, Idaho, Illinois, Kansas, Louisiana, Michigan, Minnesota, Montana, Nevada, New Jersey, North Dakota, Rhode Island, Washington, and Wisconsin. Many also may permit recall of local officials.

In a number of states that do not allow recall of state officials, provisions exist for recall of certain local officeholders: Arkansas, Connecticut, Hawaii, Florida, Maine, Maryland, Massachusetts, Missouri, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, South Dakota, Tennessee, Texas, Vermont, West Virginia, and Wyoming.

Virginia refers qualifying voter-initiated recall petitions to the judiciary for action.

# Recall Laws Overview

State	Officials subject to recall	Recall may be initiated after official has been in office	Recall may not be initiated with
Alaska	All state and local officers, but judicial officers	120 days	180 days
Arizona	All, state and local officers	6 mos./5 days legislators (after start of legislative session)	
California	All, state and local officers	90 days	6 mos
Colorado	All, state and local officers	6 mos	6 mos
District Of Columbia	All local officials, including citywide and ward-level offices	365 days	365 days
Georgia	All state, county, city elected officials	180 days - recall petition may be filed during the first 180 days or during the last 180 days of the term	180 days
Idaho	All, state and local officers, but judicial officers (a)	90 days	
Illinois	Governor only		
Kansas	All, state and local officers, but judicial officers	120 days	180 days
Louisiana	All, state and local officers, but judicial officers	1 day	6 mos
Michigan	All, state and local officers, but judicial officers	1 year	1 year
Minnesota	All state level officers		6 mos
Montana	All, state and local officers	2 mos	
Nevada	All, state and local officers, but judicial officers	6 mos - For legislators, anytime after 10 days from the beginning of the first legislative session after their election	
New Jersey	All, state and local officers	The recall drive may not commence before the 50th day preceding the completion of the elected official's first year of the current term	6 mos
North Dakota	All, state and local officers	90 days	190 days
Oregon	All, state and local officers	180 days - Unless it is a state senator or representative and then it is anytime after fifth day	
Rhode Island	Gov., lt. gov., atty. gen., sec. of state, treasurer	6 mos	
Virginia	All state and local officers, but judicial officers	Rules governed by state statute	
Washington	All state and local but judges of courts of record (a)	Immediately	180 days
Wisconsin	All, state and local officers	1 yr	



# Recall Processes

State	Maximum time allowed for petition circulation	Grounds for Recall	Days allowed for petition certification	Days to step down	Election Held	Signature Requirement
Alaska	up to 180 days before termination of office holder's	Lack of fitness, incompetence, neglect of duties or corruption	30	1	60-90 days after cert.	25% of the votes cast in the state, senate or house district in last election for the official being recalled
Arizona	120 days	No grounds required	70	5	60 days after the petition is deemed sufficient but not within 30 days after. If a general election is within 90 days of filing, the recall election will be held in conjunction with the general election.	25% of the votes cast in last general election for all candidates for the office held by the official being recalled divided by # of offices being filled
California	160 days	No grounds required	10	(k)	60-80 after cert.	For statewide officers: 12% of the last vote for the office, with signatures from each of five counties equal in number to 1% of the last vote for the office in the county. State Senators, members of the Assembly, members of the Board of Equalization, judges of courts of appeal: 20% of the votes cast in the last election for the official being recalled
Colorado	60 days	No grounds required	10	5	45-75 days after cert.	25% of the votes cast in the last election for the official being recalled
Georgia	(a)	(c)	30-45	...	30-45 days after cert. If a primary or general election is to be held not less than 30 days nor more than 45 days after such call is issued, the recall election shall be conducted on that date.	For statewide officers: 15% of registered voters for office at time of last election, 1/15 from each congressional district in the state. Others: 30% of registered voters for office at time of last election
Idaho	75 days	No grounds required	10	5	45+ days after cert. (s)	20% of registered voters for office at time of last election
Illinois	150 days	No grounds required	...	...	100 days after cert.	15% of the votes cast for governor in the preceding general election from each of at least 25 counties
Kansas	90 days	(d)	30	Next day	60-90 days after cert.	40% of the votes cast in the last election for the official being recalled
Louisiana	180	No grounds required	15-20	5	(l)	33-1/3% of eligible voters (r)

Michigan	90 days	No grounds required	35	...	(m)	25% of total votes cast for governor in the officer's electoral district at last election
Minnesota	90 days	(e)	10	...	(n)	25% of total votes cast for position at last election
Montana	3 mos	(f)	Statewide officials 270, others 180 dys.	5	(o)	For statewide officers: 10% of eligible voters for office at time of last election. For district officers: 15% of eligible voters for office at time of last election
Nevada	90 days	No grounds required	(j)	5	(p)	25% of the votes cast in the last election for the office or official being recalled
New Jersey	(b)	No grounds required	10	5	(q)	25% of the registered voters in the electoral district of the official sought to be recalled
North Dakota	90	No grounds required	30 (5-7)	10	50-60 (95-105 unless general election is scheduled w/i 95 days)	25% of the votes cast for governor in the officer's electoral district in the last election
Oregon	90 days	No grounds required	10	5	w/i 35 days after resignation period	15% of total votes cast in officer's district for all candidates for governor in the last election
Rhode Island	90 days	(g)	90	...	...	15% of total votes cast for said office in last general election
Virginia	...	(h)	...	...	...	10% of votes cast in officer's district
Washington	30 days	(i)	not specified	...	45-60 days after cert. If possible to be held on regularly scheduled election; cannot be held between the primary and general election.	For statewide officers: 25% of the votes cast in the last election for the official being recalled. Others: 35% of the votes cast in the last election for the official being recalled
Wisconsin	60 days		31	10	6 weeks after cert.	25% of total votes cast for the office of governor at the last election within the same district or territory of that officer being recalled

See Appendix 3: Recall Key

## Impact of Home Rule on Election Law

Most states do not have constitutional provisions regarding recall, though cities, counties and special districts in those states might have their own established procedures. The degree to which local governments have political autonomy, separate from the state, is called home rule. Because there are 3,000 counties and 19,000 cities in the United States, this study did not examine local governments' possible procedures for recalling elected officials.

Generally speaking, the authority of all local governments—counties, cities, school districts and other special districts—falls into three categories. In 31 states, the power of local governments to make decisions independent of state control is very limited. In those states, municipal corporations derive their power from the state. The local governments in those states do not have their own charters. This policy is based on the theory articulated in 1868 by Iowa Supreme Court Justice John F. Dillon that local governments are considered an extension of the state. Some of these states have recall provisions in state law, which would mean local governments in those states could use those provisions.

A second category would be some modification of the Dillon Rule. That is, local governments might have limited autonomy to make and enforce their own decisions. An example is Florida, where there is general home rule, except for taxation, which is controlled by the state. Other limitations in other places might limit local autonomy by the size of the jurisdiction, or in some specific policy area.

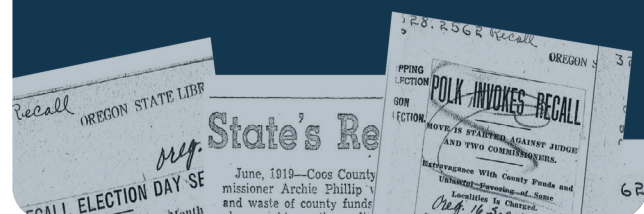
Oregon is in the third category of 10 states that are considered home rule states.

In 1906, Oregon voters passed two amendments to the state constitution. [Article XI, § 2](#) states:

The Legislative Assembly shall not enact, amend or repeal any charter or act of incorporation for any municipality, city or town. The legal voters of every city and town are hereby granted power to enact and amend their municipal charter, subject to the Constitution and criminal laws of the State of Oregon, and the exclusive power to license, regulate, control, or to suppress or prohibit, the sale of intoxicating liquors therein is vested in such municipality; but such municipality shall within its limits be subject to the provisions of the local option law of the State of Oregon.

**“Voters are becoming more interested in what’s going on in their local, small elections more than ever.”**

**Amy Southwell, Lincoln County Clerk**



The second amendment regarding local authority is in [Article IV, § 1\(5\)](#):

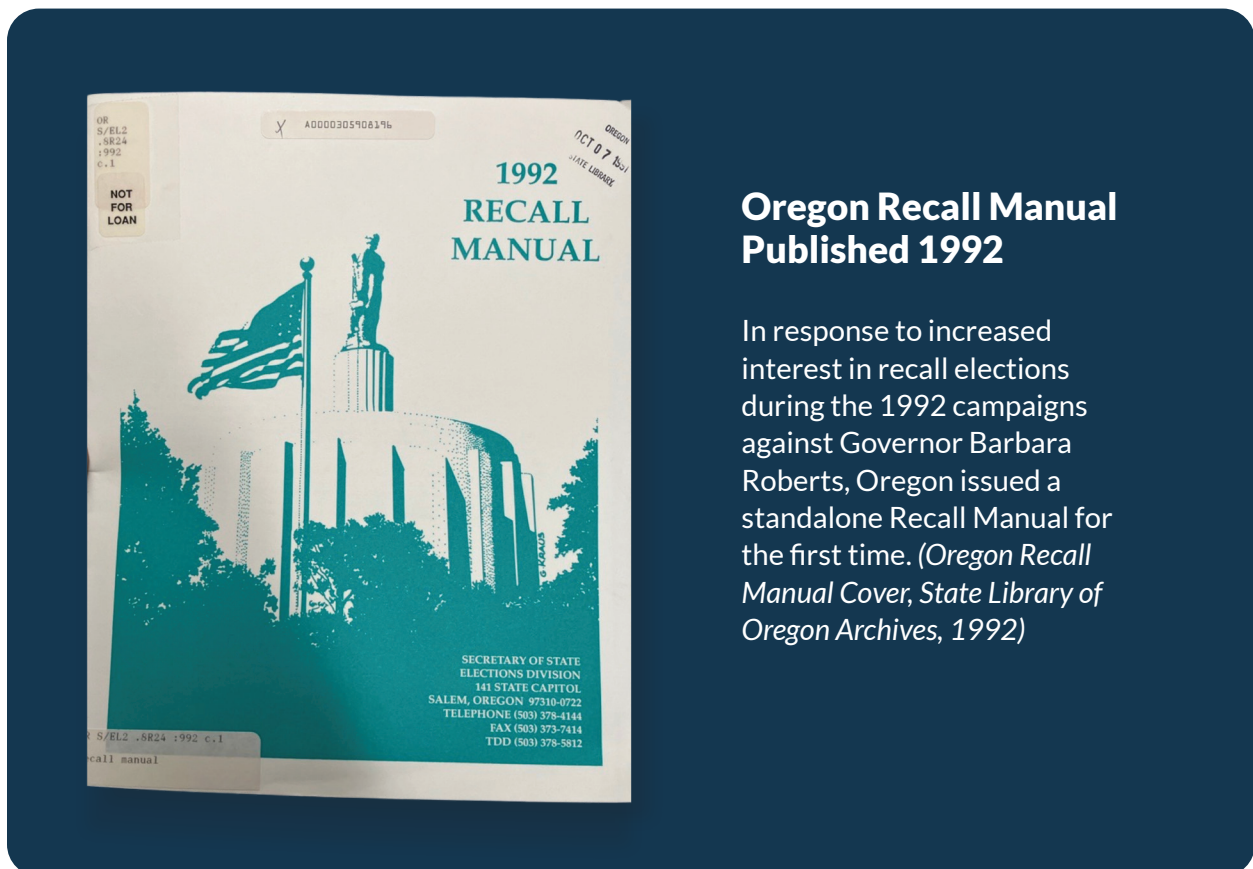
The initiative and referendum powers reserved to the people by subsections (2) and (3) of this section are further reserved to the qualified voters of each municipality and district as to all local, special and municipal legislation of every character in or for their municipality or district. The manner of exercising those powers shall be provided by general laws, but cities may provide the manner of exercising those powers as to their municipal legislation.

Together, these amendments reserve most general powers to local voters. The voters in every local government are allowed to have their own individual charters to serve as a local constitution. Most cities have their own charters, but some small political subdivisions

choose to follow state law without a specific charter. Oregon has nine home rule counties, listed in the order of their charter adoptions: Washington, Lane, Hood River, Multnomah, Benton, Jackson, Josephine, Clatsop, and Umatilla.

But Oregon cities do not exercise home rule authority in a vacuum. They are subject to provisions of the U.S. and Oregon Constitutions. While the Oregon Constitution provides for the recall, it does not specify how local offices vacated by recall occur.

There were numerous court cases between Oregon cities and the state to address the limits of local decision making. State and federal laws might supersede local decision making in some cases, but the structure of the local government itself rests with the local government. This includes elections.



## Oregon Recall Manual Published 1992

In response to increased interest in recall elections during the 1992 campaigns against Governor Barbara Roberts, Oregon issued a standalone Recall Manual for the first time. (*Oregon Recall Manual Cover, State Library of Oregon Archives, 1992*)

Although the concept of home rule may sound benign, the local control deriving from home rule also confers the power to exclude. In the context of land use and housing policies, this has historically helped create and perpetuate residential segregation.

## Perspectives on Recall

In 2014, Cliff Collins, for the League of Oregon Cities (LOC), examined the impacts and aftermath of recall efforts. At that time, the National Conference of State Legislatures estimated that three-quarters of all recall elections took place at the level of city councils or school boards. (Collins, League of Oregon Cities, 2014)

Recall action often results from poor communication on the part of elected officials and a lack of transparency in decision making, according to Collins. Newly elected officials may not fully understand their role within city government and may be unfamiliar with policies and procedures. Recall elections can be disruptive to communities, especially those with recurring attempts. Most mayors and city councilors in Oregon are unpaid volunteers and the threat and frequent use of recall can discourage people from running for office. Recalls also can be challenging for city staff, who must maintain neutrality while continuing to work in a divisive setting.

Another perspective: “Dear Supporter, THEY’RE BACK!...” So began the June 1, 1992 letter sent by Oregon Governor Barbara Roberts to 11,000 of her constituents. During her only term as governor, Roberts would be threatened with three recalls. She was Oregon’s first woman governor. In March 1992, recall proponents had filed the first petition in Oregon to recall a governor. Roberts’ plea responded to the second recall campaign launched that year.

To qualify for the ballot, 166,928 valid signatures would need to be collected for each recall. The first attempt (March to May 1992) and second attempt (July to September 1992) did not gather sufficient signatures. The third effort (October 1993) ended with no returned petitions.

The only other attempts to recall Oregon’s governor occurred during Kate Brown’s tenure as Oregon’s second female governor. Proponents launched an effort in 2017, two in 2019, and three in 2020.

[In 2023, former Governor Roberts told a news reporter:](#) “The thing we have in common is fairly obvious... I think some people have trouble seeing women as leaders, and they don’t want women telling them what to do.”

More recently, in late 2023, League members interviewed 10 current and former elections officials to learn more about their experiences with the recall process, and their perspectives on impacts posed by the recall’s legal framework and process.

## Perspectives from Elections Officials & Observers in Oregon

ISSUE	IMPACTS
<p>Tight timelines create potential challenges.</p> <p>This includes the requirement that a recall election be held no later than the 35<sup>th</sup> day after the last day for officeholders to resign—when they are the subjects of recall petitions for which sufficient signatures are verified.</p>	<p>Conflicts with requirement to mail overseas and uniformed-service ballots 45 days before an election—could this be an unconstitutional barrier to equal representation?</p> <p>Requirement that voters register 21 days in advance of an election may result in some community members unable to participate if unaware of recall election until late in process.</p> <p>Condensed schedule challenges elections staff in producing, mailing and counting ballots, while providing public information and assuring transparency.</p> <p>Election date may impair voter education and turnout. In an effort to promote voter engagement, elections officials try to hold all elections on Tuesdays, even if that may somewhat shorten the timeline.</p>
<p>Workload for staff in local districts and elections offices can be considerable.</p>	<p>Work may include: public information and constituent service; signature verification; mail preparation; updating web pages and social media; ballot collection, inventory and counting; communication and coordination among elections officials, recall proponents and opponents, elected officials who are the subject of recall attempt; elected officials needing information to fulfill their duties; etc.</p> <p>Operations may set staffing levels for routine, predictable elections-related work, and may lack depth</p>

	<p>for the increased workload, especially if multiple recalls occur within a year.</p> <p>The timing for recalls ignores the four statutorily designated election dates. (ORS 171.185)</p>
<p>Financial impacts on local districts and elections offices can be significant.</p>	<p>Postage, printing, staffing, and other expenses add up—beyond those for “regular” elections.</p> <p>Counties bear the costs for most elections, though they seek reimbursement from special districts and cities for elections falling “off cycle.” Smaller, local districts in particular may not budget sufficiently for the impacts of unanticipated recall elections. Additionally, a <a href="#">June 2023</a> study found that many Oregon counties rely upon recording fees from real property transactions to support elections operations. This revenue source fluctuates with economic conditions.</p>
<p>Oregon laws and practices provide a variety of succession scenarios following successful recalls. Voters themselves do not select immediate, or interim, successors.</p>	<p>After removing elected officials from office by recall, voters may have to wait months for a designated election to fill the vacant seat. During the interim, seats typically are filled by appointment:</p> <ul style="list-style-type: none"> <li>- If the governor is recalled or the position becomes vacant for any reason, the Secretary of State becomes governor.</li> <li>- If the Secretary of State position is vacated, the governor appoints an Acting Secretary of State who serves until the next election.</li> <li>- If the position of a state legislator is vacant, it must be filled by a person from the same political party. The elected precinct people from that legislator’s district recommend three candidates to their Board(s) of County Commissioners, who then choose the replacement legislator from that list.</li> <li>- If a county commission or city council or school board</li> </ul>

	<p>or special district board has a vacancy, the remaining members of that board appoint someone to fill the vacancy, according to their own rules and adopted procedures.</p>
<p>Perceptions about “incumbency advantage” and gerrymandering effects play a role.</p>	<p>Dissatisfied voters may see regular elections, Primary and General, as formidable for electing alternative candidates, given the advantages that can be conferred by gerrymandering and incumbency.</p>
<p>Qualifying a proposed recall for the ballot is challenging.</p>	<p>A large percentage of recall attempts fail at the petition level. Proponents may miss procedural steps, fail to obtain sufficient valid signatures, etc.</p> <p>In Oregon, the required number of valid signatures is 15 percent of the votes cast for governor in the elected official’s district, zone or ward during the last gubernatorial election at which a candidate for Governor was elected to a full term.</p> <p>Attempted recalls of state legislators in Oregon is rare.</p>
<p>Recalls that qualify for the ballot often are successful.</p>	<p>One national study shows that about 60 percent of officials who faced a recall lost, with another six percent resigning before the election.</p>
<p>The use of recall illustrates one way to address differences in the political sphere.</p>	<p>Data show that the recall has been a popular tool Oregon voters have used since its enactment in 1908.</p> <p>Although it may feel as if polarization drives contemporary political debate and tactics, other eras also may have seemed similarly divided to their inhabitants.</p>



<p>Building trust in the elections system and in government requires transparency and reliable, accessible information—especially from government sources.</p>	<p>The public deserves more education on the recall process, the issues involved in specific recall attempts, and associated costs.</p> <p>Voters may not always understand relevant facts when signing a recall petition.</p> <p>Fair and accurate elections depend on an informed public.</p>
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## Summaries of Recall Activity in Oregon

A comprehensive review of recall attempts in Oregon lies beyond the scope and resources of this study. Among other challenges, Oregon’s 36 counties do not make all election information available in consistent ways. Compiling data would require accessing archival materials dating to 1908, if even available. Several snapshots of recall activity, provided in the following summaries, offer a window onto various recall attempts.

## Oregon Recalls, 2020-2023

At least 43 recall campaigns targeting 73 officeholders occurred in Oregon during 2020-2023. Of those efforts, 23 failed to qualify for the ballot because of insufficient signatures, another 16 saw petitions withdrawn, and five officials resigned before recall could proceed. Where elections advanced, voters recalled 22 officials, with seven votes failing. (Ballotpedia, 2023)

Positions pursued	Counties where recall attempts occurred	Special districts in which recalls were considered
Governor State Representative State Senators County Judge City Mayors Special Districts officials City officials, including Councilors County Commissioners	Baker Benton Clackamas Coos Curry Douglas Grant Jefferson Josephine Lane Lincoln Malheur Marion Morrow Multnomah Tillamook Washington Yamhill	Alsea School District Bay Area Health District Central Coast Fire District Eugene School District Glide School District John Day-Canyon City Parks District Molalla River School District Newburg School District Salem-Keizer School District West Valley Fire District Winston-Dillard School District

## Oregon's Cities, 2003-2013

Elected officials in Oregon cities faced 72 recall attempts between 2003-2014. This included 23 elections in 13 Oregon communities between 2010-2013, with expenses totaling nearly \$50,000. A small number of towns also experienced multiple recall attempts: Rockaway Beach, in 2010 and 2011; Detroit, three recall elections in 2011; Rainier, in 2011 and 2013; and Weston, also in 2011 and 2013. In 10 of the elections overall, 50 percent or fewer of the eligible voters participated. (Collins, League of Oregon Cities, 2014)

## Across Oregon, 1965-1975

During this period, recall petitions were filed against 122 elected officials, 22 elections were held (some with multiple officials on the ballot), and 31 officials were recalled. Targeted officials included: 48 school board members; 40 county commissioners; 14 city council members; seven water district board members; six fire district board members; two mayors; two judges; one district attorney; and two others.

The stated reasons for recall varied, ranging from attitude to performance and personnel issues. Two examples: (1) In October 1965, Coos County voters voted to recall a county commissioner. Recall proponents claimed among other things that the official caused “hard feelings,” and disrupted efficient operations by interfering with other county departments and other elected officials. (2) In June 1974, voters in Umatilla County recalled three members of the Stanfield School Board, while retaining one board member. Recall proponents said the officials failed to reinstate a teacher supported by a large portion of the community, and blamed board members for a “...(b)breakdown in morale and lack of

communication between administration, board and staff.” ([Legislative Research Office, Oregon Legislature, 1975](#))

## One County: Marion County, 1990-2023

During the 33-year span of 1990-2023, 143 elections occurred across Marion County. Sixteen percent of these (22) were recall campaigns. All of these elections were held in small towns or school districts. Only one did not garner enough signatures to go to ballot, for the Salem-Keizer School District in 2022. ([Marion County Elections, 2024](#))

The busiest election year was 1990, during which the county held 10 elections, three of them recall elections. The most unusual year was 2011. The county held eight elections, five of them for recalls. Three of these elections took place in one small town with a population of 205, Detroit. These elections resulted in the removal of two city councilors and the mayor from office. The three elections took place within a span of about eight weeks—on September 20, October 18, and November 22. The chief petitioner for each recall was the former mayor.

Fewer signatures overall are needed to place a recall on the ballot in a small community than in a larger city. On August 25, 2022, advocates launched a campaign to recall three members of the Salem-Keizer School Board. By November 23, 2022, the petitioners had failed to garner the 16,283 signatures required for the election to proceed. Compare this effort to that of petitioners in Turner, who needed only 157 valid signatures to launch a recall election to successfully remove a city councilor in January 2023. ([Poehler, Salem Statesman Journal, 2022](#))

## Issues & Consequences

Recall efforts can raise a variety of questions, from the appropriate role of elected officials to the possibility of unintended consequences.

## Role of Elected Officials

Who is making law, elected officials or voters? In a representative democracy, citizens elect officials to vote on laws on their behalf. In a direct democracy, citizens vote on every issue themselves. In Oregon and the United States, even when voters may wield significant influence, officeholders make most of the policy and financial decisions.

When it comes to a recall effort, voters decide, first, whether to put the question on the ballot and then, whether to retain or expel an elected official. This is an example of direct democracy. But the impetus for recall can arise when certain voters believe an elected representative does not represent them fairly or faithfully. Especially in a district characterized by diverse opinions, needs and wants, a recall effort can raise the question of whom an officeholder is supposed to represent.

In King City, Oregon, voters in February 2024 recalled four city councilors, including one who filled the rotating mayor's seat. The action stemmed from concerns about land use and transportation planning and a proposed road extension. One ousted officeholder called the effort an abuse of the democratic process, arguing the action was not justified. A recall proponent argued that elected officials had not represented residents when approving a master plan. Turnout in the election was under 50 percent, and each of the elections was close—with the biggest spread for one race at 51.49% "yes" votes to 48.51% "no" votes. ([Bishop, Valley Times, 2023](#))

According to [John Griffin](#), an associate professor at University of Colorado Boulder, "(t)he question of whether voters hold elected officials accountable is right at the heart of our democracy." He concludes it may be beneficial for representatives hoping to secure voter support and reelection to make sure their votes align with the views of their constituents. Elected officials repeatedly face the challenge of balancing their votes and decisions against their own knowledge and beliefs and what they hear or learn from their constituents.

## Money's Possible Influence

The League maintains that money complicates our democratic system. Politicians are expected to represent each person equally, regardless of financial status. The principle of "one-person, one-vote" means that rights are equally important from individual to individual. Within the context of recall campaigns, it seems possible that spending could influence voter opinion, voter engagement, and election outcomes. But drawing a direct line between dollars and results is difficult.

[According to Oregon Public Broadcasting](#), United Food and Commercial Workers Local 555 spent more than \$300,000 on a campaign to recall Oregon State Rep. Paul Holvey in October 2023. Holvey himself spent more than \$250,000 in 2023, much more than he had previously spent on an election. In the end, only about 10 percent of voters chose recall. How, then, to evaluate the role of money in the election? Which other factors influenced voters?

[In 2013, legal scholar Elizabeth Garrett](#) examined campaign finance and recall elections. The connection between candidates and direct democracy exists in recall elections, though scholars and the judicial system have paid little attention to recall election rules, particularly campaign finance regulations.



Garrett offers several suggestions:

**(1)** Case law could support applying contribution limits to any committee controlled by an officeholder or candidate, even within the confines established by the U.S. Supreme Court under Chief Justice John Roberts.

**(2)** States could consider limiting the ability of a candidate to establish separate recall-focused fundraising operations during an election, as Wisconsin does.

**(3)** Recall proponents and opponents should disclose the source and amount of campaign-related funds. The information serves as a cue for voters.

**(4)** Disclosure must begin early, and occur regularly and in a timely way, so that voters can learn about groups involved as petitions circulate.

**(5)** Petition circulators should wear badges indicating whether they are paid or volunteers. Only petition drives using volunteers demonstrate evidence of popular support, according to Garrett.

Revealing the real parties behind campaign funding is a challenge, requiring a focus on designing disclosure laws to provide necessary information despite complex organizational structures. Garrett makes the case for setting disclosure thresholds at the level of significant contributions, to avoid information overload for voters and protect small donors from retaliation. Sensible thresholds might differ depending on the type of election or size of district.

## The Other Money Issue: Resources for Local and County Elections Operations

Staff and students with the Elections & Voting Information Center at Reed College issued the [“Oregon County Election Staffing Research Study”](#) in June 2023, which found insufficient staffing in Oregon elections offices, with levels below those from five to 10 years before. Staffing levels had not kept up with increases in total registered voters following enactment of automatic voter registration.

In a large county, staffing may amount to one employee per 46,000 voters. Oregon elections officials also confirmed that hiring and retaining qualified election staff have been challenging in recent years. According to the Reed study, counties administer most elections for local, state, and federal races and measures, and bear almost all of the costs of administering these elections. Even with some reimbursement, county resources support much of this work.

## Incumbency and Gerrymandering

Recall proponents commonly hear variations on the question, “Why not wait until the next election to put your own candidate in office?” Or, put another way, what’s so bad that can’t wait? Proponents simply may decide an official’s improper behavior and actions rise to a degree warranting an immediate response. Dissatisfied voters also may believe that unseating an officeholder through recall offers a better shot at success than competing during the regular election because of the perceived

advantages conferred by incumbency and gerrymandering.

The “incumbency advantage” grew over the 20th century for members of the U.S. Congress, as well as for statewide seats, according to a 2004 study. One explanation is that, by virtue of having been elected and then served, incumbents may be seen as more able. Another explanation is that some voters and campaign supporters believe races with incumbents to attract a less competitive, or less qualified, pool of opposition candidates.

A [2021 paper](#) also explored incumbency. “Few electoral arenas are more favorable to incumbents than non-partisan cities. Re-election rates among incumbent candidates in these contests regularly exceed ninety percent, and elections in which every incumbent candidate is successfully re-elected are so common as to merit little more than passing mention in post-election news coverage...”<sup>2</sup>

The perception that gerrymandering has strengthened an official’s hold on an electoral district also may influence some voters.

## Recall and Intimidation

Recall efforts may distress elected officials and their supporters, but the recall itself is not inherently abusive. Campaigns and debates have the potential to draw out individuals and groups whose speech and actions can be harmful to officeholders and others.

In a [report issued in January 2024](#), the Brennan Center for Justice described the growing incidence of threats and intimidation against officeholders. Results from national surveys showed the toll on more than 1,700 officials who represented a range of ages,

<sup>2</sup> Lucas, J., McGregor, R. M., & Tuxhorn, K.-L. (2021). Closest to the people? incumbency advantage and the personal vote in non-partisan elections. *Political Research Quarterly*, 75(1), 188–202. 202. <https://doi.org/10.1177/1065912921990751>

party affiliations, ideologies, genders, sexual orientations, racial and ethnic identities, and religions from all 50 states. Abuse ranged from insults and harassment to threats and physical attacks.

The report did not address recall elections, though it extends a warning relevant for civic life. Beyond the direct impacts of harassment and abuse on officials and their families, the Brennan Center highlights consequences for democracy. Officeholders report they are less likely to want to hold public events in public places. They are less likely to work on controversial issues, and believe abuse—or the possibility of abuse—deters colleagues from taking positions on controversial topics. Many report being less likely to run for reelection or higher office.

## Possibility of Unintended Consequences

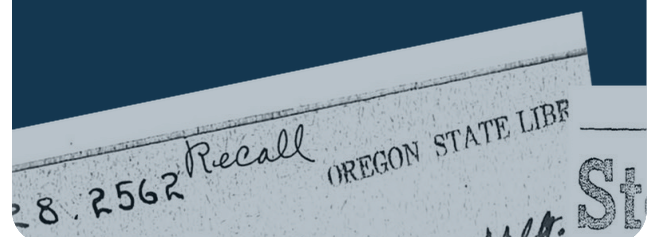
Could the removal of a California judge by recall in 2018 have resulted in unintended impacts? Aaron Persky was the first judge to be recalled by California voters in more than 80 years, with nearly 62 percent voting “yes” for recall and just over 38 percent voting “no.” The recall campaign was initiated after Judge Persky issued a mild sentence in the 2016 sexual-assault conviction of Brock Turner, a former swimmer at Stanford University who had been convicted of sexually assaulting an unconscious woman outside a fraternity party.

The sentence and subsequent recall campaign prompted debate about the criminal justice system’s response to sexual assault, white privilege, racial justice, and other critical issues. Two political scientists decided to study the impact of the campaign on criminal sentencing. Relying on data from nearly 20,000 sentences

issued by more than 150 California judges between 2015 and 2018, they found that, “... immediately after the public announcement of the Persky-recall campaign, judges began imposing sentences that were roughly thirty per cent longer on average, across the board. Those increases maintained preexisting racial disparities. In other words, even though the Persky-recall campaign aimed to raise consciousness about white privilege, the additional years in prison were disproportionately imposed on Black

**“Any person interested in recalling one of their elected officials should first consider the timelines involved and how close the next election is where that person could both be voted out of office and their replacement be chosen by voters instead of by the remaining Board members.”**

**Brian Van Bergen, Elections & Recording Manager,  
Marion County**



and Hispanic people. And, even though the campaign focused on sexual assault, the study found that the increased sentence lengths were primarily driven by nonsexual crimes, and possibly by nonviolent crimes.”<sup>3</sup>

The outcomes uncovered in this study of judicial decisions do not argue against accountability for officeholders. They do suggest that elected officials, including judges, may alter their behaviors in unexpected ways in response to recall and other voter actions. “Politics is tricky,” said Stone Gossard, “it cuts both ways. Every time you make a choice, it has unintended consequences.”<sup>4</sup>

## Form of Elections

How officeholders are elected may affect recall elections, as at least one recall proponent discovered in 2023. In some Oregon jurisdictions, including Multnomah County and Salem, officeholders are elected at the district or ward level, by voters residing in that area. In other Oregon jurisdictions, including for the Deschutes County Board of Commissioners and Grants Pass and Newport city councils, officials are elected on an at-large basis. The Eugene Water and Electric Board features a hybrid approach, with one of five commissioners elected at large and remaining four by wards.

The [Cottage Grove Charter](#), for example, outlines how its Mayor and City Council are elected: “The Council consists of a mayor and six councilors. The City must be divided into four wards. The Council must fix, and may from time to time modify, the boundaries of the wards. Each ward must be represented on the Council by one councilor. Two councilors must represent the City at large. All ward councilors

must be elected by the City at large. The mayor and at large councilors must be elected by the City at large.”

According to the Oregon Constitution, an elector of the electoral district from which the public officer is elected may file a petition demanding the recall of the public officer. Those signing a recall petition must be an active registered voter at the time of signing the petition in the electoral district where the petition is being circulated.

## Equity

Whose voice counts and whether all can participate fully are key questions in a democracy. Equal access to voting is a civil right recognized and protected by the U.S. Constitution. The disconnect between ordinary citizens and the political and donor class “... shapes what policies get made, and whose concerns get prioritized by those in power. Indeed, it shapes who gets to participate, both as voters and leaders, in our democracy.”<sup>5</sup>

In applying an equity lens, voters should consider how the recall process and specific recall campaigns better achieve full access and participation—and help ensure community safety; address the needs of community members and neighborhoods; and ensure access and meet other cultural needs.

## Does the Recall Advance Democracy?

Organizations and elected officials from U.S. President William Howard Taft to Alameda County, California, District Attorney Pamela Price have criticized the recall as anti-democratic. Legal scholars Joshua Spivak and

<sup>3</sup> Suk Gersen, J. (2023) Revisiting the Brock Turner Case. The New Yorker. <https://www.newyorker.com/news/our-columnists/revisiting-the-brock-turner-case>.

<sup>4</sup> Gossard, S. (n.d.). [https://www.brainyquote.com/quotes/stone\\_gossard\\_587855](https://www.brainyquote.com/quotes/stone_gossard_587855)

<sup>5</sup> Brennan Center for Justice, [Equity for the People](#), June 17, 2021



David A. Carrillo disagree and argue that recall elections are “raw democracy.”

“Officials targeted with a recall, the most personal of the direct democracy devices, are unsurprisingly unhappy about having to defend against it. But voters should not be fooled when their targets complain about risks to democracy. Over more than a century the recall has strengthened voter power and never caused political anarchy. That it is a power the voters themselves have overwhelmingly adopted and choose to use shows there is nothing anti-democratic about using this weapon. Democracy is rule by the people, not by elected officials.”<sup>6</sup>

Observers who support the right to recall may question whether the recall process itself is fully democratic. In what ways, do recall elections and procedures promote or hinder broad-based, fair, and informed access and participation?

**1. The Oregon Constitution is clear about who is subject to recall: all elected state and local officials.**

The Oregon Secretary of State Recall Manual outlines applicable laws and requirements, along with forms and other materials. Local elections officials provide information and ensure legal conformance.

Legal clarity is critical. Information about procedures, forms, and timelines enable advocates, elected officials, and voters to better understand requirements and process. Less-experienced advocates, however, may find the process and materials complicated and costly. Some local elections offices may lack sufficient staffing to meet public expectations.

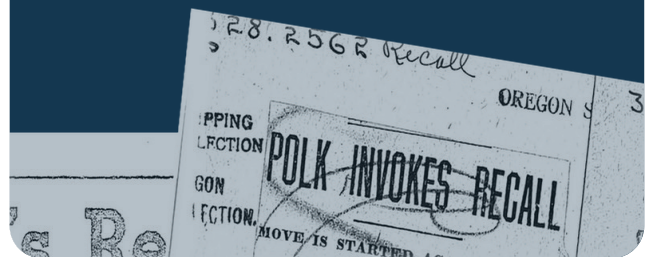
**2. Oregon laws and practices provide a variety of succession scenarios.**

Voters themselves do not select immediate, or interim, successors following successful recalls.

Succession appointments are practical actions meeting immediate needs to fill vacant seats and require that voters temporarily yield their democratic power to choose. Many voters may not realize how appointments are made to

**“Well-informed voters are more civically and politically engaged, and more likely to vote and hold their representatives accountable through elections.”**

**International Foundation for Electoral Systems**



<sup>6</sup> Spivak, J., & Carrillo, D. A. (2023, August 10). The Recall Is Raw Democracy. The Recorder. <https://www.law.com/therecorder/2023/08/10/the-recall-is-raw-democracy/?sreturn=20240219155647>

fill vacancies, and how closely voters are represented in the selection process also varies.

### **3. Recall timelines offer certainty and relief as well as barriers to education and full participation.**

Oregon's 35-day election timeline, following a successful recall petition drive, conflicts with special ballot provision requirements, may discourage new voters, and can prevent full voter education by elections offices and advocates. A recall election date occurs based on when the recall petition was filed and may catch some voters less prepared to participate.

Voter turnout for many elections in many jurisdictions can be modest, potentially contributing to decreased accountability in government and a disconnect between what voters want and what elected officials deliver. While it is not possible to confidently characterize the absolute drivers for turnout in any specific election, numbers from recent recall elections in Grant and Lane counties indicate reduced voting.

John Day voters in January 2024 recalled their city's mayor, with 258 "yes" votes and 225 "no" votes (plus one undervote). The recalled mayor had been elected in November 2022, with 404 votes to the sole opponent's 356 votes.

A recall effort targeting a state representative in Lane County drew more than 13,000 votes in the October 2023 election. Although a significant number, county data for that month show more than 42,000 registered voters in the district. In November 2022, when that same officeholder was reelected in the General Election, nearly 44,000 registered voters resided in the district, with 29,147 casting ballots.

## **Conclusion**

Supporters of recall say it improves accountability, allowing voters to remove elected officials who are nonresponsive, incompetent, unethical, or fail to sufficiently represent constituents' interests. Opponents argue that recall elections can introduce instability, give undue influence to minority parties, increase expenses for elections and campaigns, and make it harder to elect good officials. A goal for this recall study is to support League members and others considering how best to support, protect and expand voting rights and ensure everyone is represented in our democracy.

Several issues stand out:

**Finite resources for elections offices.** Many local and county elections operations lack sufficient funding and staffing levels to meet public needs and provide strong, ongoing voter education.

In [November 2023 testimony](#) to the Oregon House Committee on Rules, Paul Manson and Paul Gronke, with the Elections & Voting Information Center (EVIC) at Reed College, highlighted vast differences in staffing levels among County Clerk offices across Oregon, overworked staff during election cycles, and the contentious political atmosphere for elections workers. Counties are expected to rely on general funds, but the ongoing impacts of tax limitation Measures 5 and 50 complicate public finance choices.

**Recall election timeline.** The Oregon Constitution mandates that recall elections be scheduled to occur no later than 35 days after the last day for an elected official to resign in response to a successful recall petition drive. This means a recall election does not take place on one of the four regularly scheduled election dates each year. This condensed timeline can

affect advocates, proponents, civic organizations, and elected officials trying to reach prospective voters.

The timeline also can make it hard, if not unfeasible, for a jurisdiction to produce a voters' pamphlet or other resources. Because recall elections essentially are unplanned, the timeline can challenge elections staff in producing, mailing and counting ballots, while managing other official duties.

The 35-day mandate conflicts with the requirement that elections officials mail overseas and uniformed-service ballots 45 days before an election and could prevent voting by community members who miss the 21-day advance voter registration cutoff.

**Succession.** After removing elected officials from office by recall, voters may have to wait months for a designated election to fill the vacant seat. During the interim, seats typically are filled by appointment, through various scenarios depending on the seat vacated. Voters may not always realize upfront how succession occurs and their role in filling seats.

**Grounds.** Unlike several states, Oregon does not require grounds for initiating a recall. The factual information provided by a chief petitioner must be true, but advocates can seek to recall an officeholder for any number of reasons—from malfeasance and incompetence to policy or personality differences.

## Questions

1. How well do recall elections appear to engage and inform voters? What kinds of voter education would help community members weigh the pros and cons of a proposed recall election?
2. When comparing Oregon's process with those from other states and jurisdictions, what procedural elements seem most sound?
3. The study examines many issues, from money's influence in elections to unintended consequences that can result from recalls. Which potential benefits and challenges are most significant? What items are missing from this review?
4. Unlike a number of other states, there are no limits on the grounds for recall in Oregon. How is this open-ended approach beneficial and/or harmful?
5. On balance, are recall elections democratic? What factors could help make the recall more democratic?

# Appendix 1: LWVOR Policy and Position Statements, Governance

Initiative, Referendum and Recall Position - Adopted 1988; Revised 1996; Educational Update 2001\*

1. Statute Initiatives. The League of Women Voters of Oregon supports the constitutional right of Oregon citizens to propose or revise statutes through the direct initiative process. The League supports the following:

- Requiring a number of valid signatures not less than six (6) percent of the total number of votes cast for all candidates for governor at the last election at which a governor was elected for a term of four years;
- Requiring more than 25 signatures to file the prospective petition with the Secretary of State;
- Prohibiting legislative changes to an initiative statute for at least two years from its effective date, except to clarify implementation and to correct errors in form and style;
- Requiring an advisory opinion as to the constitutionality of each proposed initiative after it has qualified for the ballot. Such opinion should be published in the Voters' Pamphlet;
- Limiting the time frame for collecting signatures to one year;
- Optional use of the indirect initiative.

2. Constitutional Initiatives. The League of Women Voters of Oregon discourages amending the Oregon Constitution by the initiative process. If amendments by initiatives are allowed, the League supports the following restrictions:

- Requiring a number of valid signatures not less than ten (10) percent of the total number of votes cast for all candidates for governor at the last election at which a governor was elected for a term of four years;
- Requiring more than 25 signatures to file a prospective petition with the Secretary of State;
- Establishing a formula for a geographic distribution of signatures in order to reflect statewide interest in a measure;
- Requiring an advisory opinion as to the constitutionality of each proposed initiative after it has qualified for the ballot. Such opinion should be published in the Voters' Pamphlet;
- Limiting the time frame for collecting signatures to one year;
- Requiring more than a simple majority of the total votes cast for the measure for passage;
- Exempting the Oregon Bill of Rights and revenue measures from the initiative process; and
- Using the indirect initiative process and scheduling discussion of a qualified initiative first on the agenda of the next legislative session.

3. The League of Women Voters of Oregon supports the Oregon petition referendum process as provided in the Oregon Constitution.

4. The League of Women Voters of Oregon supports the recall process as provided in the Oregon Constitution.

5. The League of Women Voters of Oregon believes that ballot titles should be stated in clear, concise language and should avoid confusing negatives.

6. The League of Women Voters of Oregon opposes paying petition circulators by the signature. Paid petitioners must be required to identify themselves as such, personally and on the signature sheets. With reasonable restrictions, petitioners should be allowed to collect signatures in highly visible privately and publicly owned locations.

7. The League of Women Voters of Oregon supports publication and distribution of a state Voters' Pamphlet prior to statewide elections and believes that:

- The state has an obligation to provide the voters with accurate information so that voters can make reasoned choices;
- All ballot measures must be included with official explanatory statements, an official advisory opinion on constitutionality, effects of a "yes" and "no" vote, and summaries of the main arguments for and against the measures;
- The number of arguments for and against the measures to be included should be limited;
- The fees charged per page should more clearly reflect the actual costs.

\*Updated in 2001 for background information only – no position change.

[\\*https://www.lwvor.org/position-index](https://www.lwvor.org/position-index)

## **Appendix 2: Oregon Constitution, Article II, Section 18**

Section 18. Recall; meaning of words "the legislative assembly shall provide."

1. Every public officer in Oregon is subject, as herein provided, to recall by the electors of the state or of the electoral district from which the public officer is elected.

2. Fifteen per cent, but not more, of the number of electors who voted for Governor in the officer's electoral district at the most recent election at which a candidate for Governor was elected to a full term, may be required to file their petition demanding the officer's recall by the people.

3. They shall set forth in the petition the reasons for the demand.

4. If the public officer offers to resign, the resignation shall be accepted and take effect on the day it is offered, and the vacancy shall be filled as may be provided by law. If the public officer does not resign within five days after the petition is filed, a special election shall be ordered to be held within 35 days in the electoral district to determine whether the people will recall the officer.

5. On the ballot at the election shall be printed in not more than 200 words the reasons for demanding the recall of the officer as set forth in the recall petition, and, in not more than 200 words, the officer's justification of the officer's course in office. The officer shall continue to perform the duties of office until the result of the special election is officially declared. If an officer

is recalled from any public office the vacancy shall be filled immediately in the manner provided by law for filling a vacancy in that office arising from any other cause.

6. The recall petition shall be filed with the officer with whom a petition for nomination to such office should be filed, and the same officer shall order the special election when it is required. No such petition shall be circulated against any officer until the officer has actually held the office six months, save and except that it may be filed against a senator or representative in the legislative assembly at any time after five days from the beginning of the first session after the election of the senator or representative.

7. After one such petition and special election, no further recall petition shall be filed against the same officer during the term for which the officer was elected unless such further petitioners first pay into the public treasury which has paid such special election expenses, the whole amount of its expenses for the preceding special election.

8. Such additional legislation as may aid the operation of this section shall be provided by the legislative assembly, including provision for payment by the public treasury of the reasonable special election campaign expenses of such officer.

But the words, “the legislative assembly shall provide,” or any similar or equivalent words in this constitution or any amendment thereto, shall not be construed to grant to the legislative assembly any exclusive power of lawmaking nor in any way to limit the initiative and referendum powers reserved by the people. [Created through initiative petition filed Jan. 29, 1908, and adopted by the people June 1, 1908; Amendment proposed by S.J.R. 16, 1925, and adopted by the people Nov. 2, 1926; Amendment proposed by H.J.R. 1, 1983, and adopted by the people Nov. 6, 1984]

Note: “Recall.” constituted the leadline to section 18 and was a part of the measure submitted to the people by S.J.R. 16, 1925.

## **Appendix 3: Recall Key for pages 16-18**

Recall Key:

(a) For any statewide office, 90 days. Any officer holding an office other than statewide office and for whom no less than 5,000 signatures are required for the recall petition, 45 days. Any officer is first reimbursed for all expenses of the preceding election.

(b) The maximum time allowed for petition circulation is 320 days for a governor or U.S. Senator or 160 days for other elected officials.

(c) Act of malfeasance or misconduct while in office; violation of oath of office; failure to perform duties prescribed by law; willfully misused, converted, or misappropriated, without authority, public property or public funds entrusted to or associated with the elective office to which the official has been elected or appointed. Discretionary performance of a lawful act or a prescribed duty shall not constitute a ground for recall of an elected public official.

(d) Conviction for a felony, misconduct in office, incompetence, or failure to perform duties prescribed by law. No recall submitted to the voters shall be held void because of the insufficiency of the grounds, application, or petition by which the submission was procured. As used in this section, the term “misconduct in office” means a violation of law by the officer that impacts the officer’s ability to perform the official duties of the office.

(e) Serious malfeasance or nonfeasance during the term of office in the performance of the duties of the office or conviction during the term of office of a serious crime.

(f) Physical or mental lack of fitness, incompetence, violation of oath of office, official misconduct, conviction of certain felony offenses (enumerated in Title 45). No person may be recalled for performing a mandatory duty of the office he holds or for not performing any act that, if performed, would subject him to prosecution for official misconduct.

(g) Authorized in the case of a general officer who has been indicted or informed against for a felony, convicted of a misdemeanor, or against whom a finding of probable cause of violation of the code of ethics has been made by the ethics commission.

(h) § 24.2-233. (Effective until January 1, 2024) Removal of elected and certain appointed officers by courts. Upon petition, a circuit court may remove from office any elected officer or officer who has been appointed to fill an elective office, residing within the jurisdiction of the court:

1. For neglect of a clear, ministerial duty of the office, misuse of the office, or incompetence in the performance of the duties of the office when that neglect of duty, misuse of office, or incompetence in the performance of duties has a material adverse effect upon the conduct of the office;

2. Upon conviction of a misdemeanor pursuant to Article 1 (§ 18.2-247 et seq.) or Article 1.1 (§ 18.2-265.1 et seq.) of Chapter 7 of Title 18.2 and after all rights of appeal have terminated involving the:

- a. Manufacture, sale, gift, distribution, or possession with intent to manufacture, sell, give, or distribute a controlled substance or marijuana;
- b. Sale, possession with intent to sell, or placing an advertisement for the purpose of selling drug paraphernalia; or
- c. Possession of any controlled substance or marijuana and such conviction under subdivision a, b, or c has a material adverse effect upon the conduct of such office;

3. Upon conviction, and after all rights of appeal have terminated, of a misdemeanor involving a “hate crime” as that term is defined in § 52-8.5 when the conviction has a material adverse effect upon the conduct of such office; or

4. Upon conviction, and after all rights of appeal have terminated, of sexual battery in violation of § 18.2-67.4, attempted sexual battery in violation of subsection C of § 18.2-67.5, peeping or spying into dwelling or enclosure in violation of § 18.2-130, consensual sexual intercourse with a child 15 years of age or older in violation of § 18.2-371, or indecent exposure of himself or procuring another to expose himself in violation of § 18.2-387, and such conviction has a material adverse

effect upon the conduct of such office. <https://law.lis.virginia.gov/>

(i) Malfeasance, misfeasance, or violation of the oath of office, as those terms are defined in the recall statutes.

(j) Within four days, county clerks count signature totals and forward to the Secretary of State. The Secretary of State immediately notifies the clerks if they are to proceed with signature verification.

(k) Prior to election being called.

(l) The local registrar of voters sends the original certified recall petition to the governor, who issues, within 15 days, a proclamation calling a special election, placing the special election on the next regularly scheduled election date.

(m) Under Michigan's consolidated elections, the recall election is held on the next fixed election date that falls at least 95 days after the recall petition is filed.

(n) An election will not be held in the last 6 mos. of a term after certification.

(o) A special election is called unless the filing is within 90 days of a general election.

(p) In Nevada, a recall election is held 10-20 days after the Secretary of State completes notification of the petition sufficiency unless a complaint is filed, the clerk shall issue a call for the election which is to be held within 30 days after the issuance of the call.

(q) New Jersey Permanent Statutes, 19:27A-13, In the case of an office which is ordinarily filled at the general election, a recall election shall be held at the next general election occurring at least 55 days following the fifth business day after service of certification, unless it was indicated in the notice of intention to recall that the recall election shall be held at a special election in which case the recall election official shall order and fix the date for holding the recall election to be the next Tuesday occurring during the period beginning with the 55th day and ending on the 61st day following the fifth business day after service of the certification of the petition.

(r) Basis for signatures 33 1/3 percent if over 1,000 eligible voters; 40 percent if under 1,000 eligible voters.

(s) In Idaho, the dates on which elections may be conducted are the first Tuesday in February, the fourth Tuesday in May, the first Tuesday in August, or the Tuesday following the first Monday in November. In addition, an emergency election may be called upon motion of the governing board of a political subdivision. Recall elections conducted by any political subdivision shall be held on the nearest of these dates which falls more than 45 days after the clerk of the political subdivision orders that the recall election shall be held.



# References

## Introduction

LWVOR Policy and Position Statements

<https://www.lwvor.org/position-index>

Proposal to study recall at [May 2023 LWVOR Convention](#)

## What is Recall?

Oregon Constitution, See Article II, Section 18.

[https://www.oregonlegislature.gov/bills\\_laws/Pages/OrConst.aspx](https://www.oregonlegislature.gov/bills_laws/Pages/OrConst.aspx)

## Oregon's Current Recall Process

Recall Manual (January 2024). Oregon Secretary of State, Elections Division, State of Oregon.

<https://sos.oregon.gov/elections/Documents/RecallManual.pdf>

## History of Recall in Oregon

Legislative Research Office (1975). The Historical Development and Use of the Recall in Oregon, Oregon Legislature, with references to Barnett, J.D. (1912), The Operation of the Initiative, Referendum, and Recall in Oregon, MacMillan Press.

<https://search.worldcat.org/title/17884256>

Oregon Secretary of State (2023). Oregon Blue Book, On Initiative, Referendum and Recall, Oregon State Archives.

<https://sos.oregon.gov/blue-book/Documents/elections/initiative.pdf>

Root, D.W. (2006). Review of Southern, D.W., When bigots become reformers: the Progressive Era's shameful record on race. The Progressive Era and Race: Reform and Reaction, 1900-1917 (2005), Wheeling, WV.: Harlan Davidson.

<https://www.usd116.org/ProfDev/AHTC/lessons/PollockFel10/2bbigotsreformers.pdf>

Foundation for Economic Education (03/07/2019). The Progressive Ideas That Fueled America's Eugenics Movement.

<https://fee.org/articles/the-progressive-ideas-that-fueled-america-s-eugenics-movement/>

Paulus, Norma (11/06/1984). Oregon Voters Pamphlet, State of Oregon, Oregon Secretary of State.

<https://search.worldcat.org/title/16968522>

## Basic Elements of Recall Laws & Process

Recall overview (March 2024). Ballotpedia; nonprofit, nonpartisan digital encyclopedia of American politics.

[https://ballotpedia.org/Recall\\_overview](https://ballotpedia.org/Recall_overview)

Recall of State Officials (March 2024). National Conference of State Legislatures website.  
<https://www.ncsl.org/elections-and-campaigns/recall-of-state-officials>

Council of State Governments (2021). The Book of the States.  
<https://issuu.com/csg.publications/stacks/46495f12f95847e6935d331969ed650a>

#### Alaska

Alaska Division of Elections (March 2024). State Office Recall Petition Process.  
<https://www.elections.alaska.gov/Core/petitionrecallprocess.php>

Justia U.S. Law (March 2024). Alaska State Statutes.  
<https://law.justia.com/codes/alaska/>

Alaska State Legislature (2023). Alaska Statutes Chapter 45, Section 15.  
<https://www.akleg.gov/basis/statutes.asp#15.45.470>

#### California

Office of the Secretary of State, State of California (rev. January 2024). Procedures for Recalling State and Local Officials.  
<https://elections.cdn.sos.ca.gov/recalls/recall-procedures-guide.pdf>

#### Montana

Montana Code, Annotated 2009, Title 2. Government Structure and Administration, Chapter 16, Public Officers, Part 6. Montana Recall Act.  
[https://web.archive.org/web/20100504063331/http://data.opi.state.mt.us/bills/mca\\_toc/2\\_16\\_6.htm](https://web.archive.org/web/20100504063331/http://data.opi.state.mt.us/bills/mca_toc/2_16_6.htm)

#### Michigan

Constitution of Michigan of 1963, Article II, Section 8.  
[https://www.legislature.mi.gov/\(S\(wwb4s2lgl32ewp5yicl2x\)\)/mileg.aspx?page=getObject&objectName=mcl-Article-II-8](https://www.legislature.mi.gov/(S(wwb4s2lgl32ewp5yicl2x))/mileg.aspx?page=getObject&objectName=mcl-Article-II-8)

#### Minnesota

Office of the Minnesota Secretary of State (March 2024). Elections & Voting, Recall.  
<https://www.sos.state.mn.us/elections-voting/how-elections-work/recalls/>

Minnesota Constitution, ARTICLE VIII, Impeachment and Removal from Office, adopted October 13, 1857, generally revised November 5, 1974, accessed March 2024.  
[https://www.revisor.mn.gov/constitution/#article\\_8](https://www.revisor.mn.gov/constitution/#article_8)

2023 Minnesota Statutes, chapter 211c. Recall of Elected State Officials.  
<https://www.revisor.mn.gov/statutes/cite/211C>

## New Jersey

Justia, U.S. Law, 2021 New Jersey Revised Statutes, Title 19, Elections Section 19:27A-4, Recall; vote required, service of term, statements, procedures.

<https://law.justia.com/codes/new-jersey/2021/title-19/section-19-27a-4/>

New Jersey School Boards Association, Uniform Recall Election Law, Frequently Asked Questions, August 2020.

<https://www.njsba.org/wp-content/uploads/2020/08/legal-recall-election-law.pdf>

## Nevada

Lauer, K. (04/14/2017). Nevada High Court Exempts Judges From Voter Recalls, Courthouse News Service.

<https://www.courthousenews.com/nevada-high-court-exempts-judges-voter-recalls/>

<https://www.courthousenews.com/wp-content/uploads/2017/04/NV-Judicial-Recall-Ruling.pdf>

State of Nevada Recall Guide 2024, Published by the Office of the Nevada Secretary of State.

<https://www.nvsos.gov/sos/home/showpublisheddocument/9849/638246775584170000>

## Oregon

Oregon Revised Statutes, 2023, Title 23: Elections, Chapter 254. Conduct of Elections.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors254.html](https://www.oregonlegislature.gov/bills_laws/ors/ors254.html)

Oregon Revised Statutes, 2023, Title 23: Elections, Chapter 249, Candidates; Recall.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors249.html](https://www.oregonlegislature.gov/bills_laws/ors/ors249.html)

Oregon Revised Statutes, 2023, Title 23: Elections, Chapter 255, Special District Elections.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors255.html](https://www.oregonlegislature.gov/bills_laws/ors/ors255.html)

Oregon Revised Statutes, 2023, Title 22: Public Officers and Employees, Chapter 236, Eligibility; Resignations, Removals and Vacancies; Discipline; Transfers.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors236.html](https://www.oregonlegislature.gov/bills_laws/ors/ors236.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_236](https://oregon.public.law/statutes/ors_chapter_236)

Oregon Revised Statutes, 2023, Title 17: State Legislative Department and Laws, Chapter 171, State Legislature.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors171.html](https://www.oregonlegislature.gov/bills_laws/ors/ors171.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_171](https://oregon.public.law/statutes/ors_chapter_171)

Oregon Revised Statutes, 2023, Title 30: Education and Culture, Chapter 332, Local Administration of Education.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors332.html](https://www.oregonlegislature.gov/bills_laws/ors/ors332.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_332](https://oregon.public.law/statutes/ors_chapter_332)

Oregon Revised Statutes, 2023, Title 21: Cities, Chapter 221, Organization and Government of Cities.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors221.html](https://www.oregonlegislature.gov/bills_laws/ors/ors221.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_221](https://oregon.public.law/statutes/ors_chapter_221)

Oregon Revised Statutes, 2023, Title 19: Miscellaneous Matters Related to Government and Public Affairs, Chapter 198, Special Districts Generally.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors198.html](https://www.oregonlegislature.gov/bills_laws/ors/ors198.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_198](https://oregon.public.law/statutes/ors_chapter_198)

Oregon Revised Statutes, 2023, Title 23: Elections, Chapter 249, Candidates; Recall.

[https://www.oregonlegislature.gov/bills\\_laws/ors/ors249.html](https://www.oregonlegislature.gov/bills_laws/ors/ors249.html)

[https://oregon.public.law/statutes/ors\\_chapter\\_249](https://oregon.public.law/statutes/ors_chapter_249)

Rhode Island

Constitution of the State of Rhode Island, Rhode Island General Assembly, accessed March 2024.

Rhode Island Constitution Article IV, Section 1

[https://catalog.sos.ri.gov/repositories/2/digital\\_objects/1173](https://catalog.sos.ri.gov/repositories/2/digital_objects/1173)

State of Washington

Constitution of the State of Washington, Article 1, Section 33, approved 1912.

<https://leg.wa.gov/CodeReviser/Pages/WAConstitution.aspx>

Washington State Legislature, Special Circumstance Elections, Last Update: June 29, 2022, Revised Code of Washington (RCW).

<https://app.leg.wa.gov/rcw/default.aspx?cite=29A.56>

Washington, D.C.

Code of the District of Columbia, Subpart 2. Recall of Elected Officials, Council of the District of Columbia, current through February 22, 2024, with codified law effective that date.

<https://code.dccouncil.gov/us/dc/council/code/titles/1/chapters/2/subchapters/IV/parts/G/subparts/2>

### **Two Other State Leagues on Recall**

LWV of Michigan, Government Positions, originally adopted 1977; revised and amended 1984, 1991, 1993, 1997, completely revised 2001, DEI review 2023.

<https://lwvmi.org/wp-content/uploads/2024/01/Government-Positions.pdf>

LWV of Minnesota, 2021-2023 Program for Action, copyright October 2022.

<https://drive.google.com/file/d/1DiTsnAUleDQZ6EcqI-Z5YsgzeV-AhojK/view>

## **Detailed Comparisons Across States**

Recall of State Officials (2021) National Conference of State Legislatures

<https://www.ncsl.org/elections-and-campaigns/recall-of-state-officials>

Book of the States: Recall Provisions (2021) Council of State Governments. 266 – 274

<https://www.nga.org/wp-content/uploads/2022/10/CSG-book-of-the-states-2021.pdf>

Nebraska Legislative Research Office (February 2020). Dillon Rule and Home Rule: Principles of Local Governance.

[https://nebraskalegislature.gov/pdf/reports/research/snapshot\\_localgov\\_2020.pdf](https://nebraskalegislature.gov/pdf/reports/research/snapshot_localgov_2020.pdf)

League of Oregon Cities (September 2020). Oregon Municipal Handbook, Chapter 2: Home Rule and Its Limits.

<https://www.orcities.org/resources/guides-handbooks/city-handbook>

<https://www.orcities.org/resources/guides-handbooks/city-handbook/handbook-chapter-2>

## **Perspectives on Recall**

Collins, C., (March 2014). Recall Elections: The Impacts and the Aftermath, Local Focus, 20-23, League of Oregon Cities.

<https://www.orcities.org/resources/communications/local-focus/local-focus-archive>

City Club of Eugene (11/3/2023) Recall Elections: How Should They Be Used in Our Community? KLCC Radio, air date 11/06/2023.

<https://www.klcc.org/show/city-club-of-eugene/2023-11-06/city-club-of-eugene-recall-elections-how-should-they-be-used-in-our-community>

Fall 2023 interviews by LWVOR members with elections officials identified in Acknowledgements.

Dake, L. (01/09/2023). Gov. Kate Brown leaves office with a complicated legacy, A.1, Statesman Journal, Salem. Also printed Herald & News.

[https://www.heraldandnews.com/news/after-leading-oregon-through-nonstop-crises-gov-kate-brown-leaves-office-with-a-complicated-legacy/article\\_d23eccf0-9061-11ed-a963-1b13bc878d05.html](https://www.heraldandnews.com/news/after-leading-oregon-through-nonstop-crises-gov-kate-brown-leaves-office-with-a-complicated-legacy/article_d23eccf0-9061-11ed-a963-1b13bc878d05.html)

Summaries of Recall Activity in Oregon

Ballotpedia (March 2024). Recall Campaigns in Oregon.

[https://ballotpedia.org/Recall\\_campaigns\\_in\\_Oregon](https://ballotpedia.org/Recall_campaigns_in_Oregon)

Collins, C. (March 2014). Recall Elections: The Impacts and the Aftermath, Local Focus, 20-23, League of Oregon Cities.

<https://www.orcities.org/resources/communications/local-focus/local-focus-archive>

Legislative Research Office (1975). The Historical Development and Use of the Recall in Oregon, Oregon Legislature, with references to Barnett, J.D. (1912), The Operation of the Initiative, Referendum, and Recall in Oregon, MacMillan Press.

<https://search.worldcat.org/title/17884256>

Marion County Clerk's Office (accessed March 2024). Election Results, Marion County, Oregon.

<https://www.co.marion.or.us/CO/elections/Results/Pages/default.aspx>

Poehler, B. (12/14/2022). Turner city councilor faces recall after online posts about children with cancer, Statesman Journal.

<https://www.statesmanjournal.com/story/news/politics/elections/2022/12/15/turner-city-councilor-mark-mccracken-faces-recall-election-after-posts-about-kids-with-cancer/69716852007/>

### **Issues & Consequences**

Bishop, L., (03/04/2023). UPDATE: What's next for King City with 4 councilors recalled?, Valley Times, Pamplin Media Group.

[https://www.valleytimes.news/news/update-whats-next-for-king-city-with-4-councilors-recalled/article\\_226fe5c0-da4d-11ee-8204-8fb4e2ae2e4d.html](https://www.valleytimes.news/news/update-whats-next-for-king-city-with-4-councilors-recalled/article_226fe5c0-da4d-11ee-8204-8fb4e2ae2e4d.html)

Kuta, S. (04/19/2019). Research asks: Do voters hold elected officials accountable?, Colorado Arts and Sciences Magazine.

<https://www.colorado.edu/asmagazine/2019/04/25/research-asks-do-voters-hold-elected-officials-accountable>

VanderHart, Dirk, (10/04/2023). Eugene voters reject recall against state Rep. Paul Holvey in resounding fashion, Oregon Public Broadcasting.

<https://www.opb.org/article/2023/10/04/eugene-voters-reject-union-recall-attempt-representative-paul-holvey-democrat/>

Garrett, E. (2013). Campaign Finance in the Hybrid Realm of Recall Elections, Minnesota Law Review.

<https://scholarship.law.umn.edu/cgi/viewcontent.cgi?article=1365&context=mlr>

Elections & Voting Information Center, Reed College (June 2023). Oregon County Election Staffing Research Study.

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277556>

Ashworth, S. and Bueno de Mesquita, E., (08/13/2004). Electoral Selection and the Incumbency Advantage, University of Pennsylvania.

[https://economics.sas.upenn.edu/sites/default/files/filevault/u4/inc\\_adv.pdf](https://economics.sas.upenn.edu/sites/default/files/filevault/u4/inc_adv.pdf)

Ansolabehere, S. and Snyder, J.M. (January 2011). The Effects of Redistricting on Incumbents, Harvard.edu.

<https://scholar.harvard.edu/jsnyder/publications/effects-redistricting-incumbents>

Lucas, J., McGregor, R.M., and Tuxhorn, K-L (02/06/2021). Closest to the People? Incumbency Advantage and the Personal Vote in Non-Partisan Elections, Sage Political Research Quarterly, Published online at National Library of Medicine.

<https://journals.sagepub.com/doi/10.1177/1065912921990751>

Brennan Center for Justice (01/25/2024). Intimidation of State and Local Officeholders.

<https://www.brennancenter.org/our-work/research-reports/intimidation-state-and-local-office-holders>

Suk Gersen, J. (06/17/2016). The Unintended Consequences of the Stanford Rape-Case Recall, The New Yorker.

<https://www.newyorker.com/news/news-desk/the-unintended-consequences-of-the-stanford-rape-case-recall>

Suk Gersen, J. (03/29/2023). Revisiting the Brock Turner Case, The New Yorker.

<https://www.newyorker.com/news/our-columnists/revisiting-the-brock-turner-case>

Charter, City of Cottage Grove, Oregon.

<https://www.codepublishing.com/OR/CottageGrove/html/CottageGroveCH.html>

Brennan Center for Justice (June 17, 2021). Equity for the People.

<https://www.brennancenter.org/our-work/research-reports/equity-people>

### **Does the Recall Advance Democracy?**

Oregon Secretary of State Recall Manual, Elections Division, revised January 2024.

<https://sos.oregon.gov/elections/Documents/RecallManual.pdf>

Grant County, Oregon, Elections Results, Grant County website, March 2024.

<https://grantcountyoregon.net/161/Latest-Election-Results>

Lane County, Oregon, Election Results, Lane County website, March 2024.

[https://apps.lanecounty.org/Elections/Election/Index/244?\\_gl=1\\*qakkax\\*\\_ga\\*MTgwNzkyNDAw-Ni4xNzAyMzYwOTgx\\*\\_ga\\_G30BCGQ9RY\\*MTcxMDg3NDQ4NC4xNy4xLjE3MTA4NzQ1M-jAuMC4wLjA](https://apps.lanecounty.org/Elections/Election/Index/244?_gl=1*qakkax*_ga*MTgwNzkyNDAw-Ni4xNzAyMzYwOTgx*_ga_G30BCGQ9RY*MTcxMDg3NDQ4NC4xNy4xLjE3MTA4NzQ1M-jAuMC4wLjA)

Lane County, Oregon, Voter Counts, Lane County website, March 2024.

[https://www.lanecounty.org/government/county\\_departments/county\\_administration/operations/county\\_clerk/elections/registered\\_voter\\_counts](https://www.lanecounty.org/government/county_departments/county_administration/operations/county_clerk/elections/registered_voter_counts)

## Conclusion

Joint Testimony of Paul Manson, PhD, Research Director, and Paul Gronke PhD, Director, Elections & Voting Information Center (11/07/23). OR Legislative Assembly, House Committee of Rules. <https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277604>

Elections & Voting Information Center, Reed College (June 2023). Oregon County Election Staffing Research Study. <https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277556>

## Additional Resources

### Public Presentations & Recordings

Election Clerks Bill Burgess, Marion County, and Kim Williams, Polk County, Elections Under the Microscope: County Clerks Give Us Their Analysis of Strengths, Weaknesses, Opportunities and Threats, Salem City Club, November 17, 2023. <https://watch.capitalcommunitymedia.org/CablecastPublicSite/show/22806?site=1>

Spivak, J., legal commentator (11/03/2023). Presentation at the Eugene City Club. [Recall Elections: How Should They Be Used in Our Community?](#)

VanderHart, D., news reporter (09/22/2023). [The Attempted Recall of Representative Paul Holvey](#), Oregon on the Record with Michael Dunne: originally published with recorded interviews on KLCC.

Eshaia, M., United Food and Commercial Workers Local 555 (UCFW). [On the Record, KLCC, September 22, 2023.](#)

### Books/Monographs

Nixon, S. (2004). Recall Election Study: city recall election results, 1997-2003, League of Oregon Cities, Salem, Oregon. <https://search.worldcat.org/title/61147883>

Houser, J. (1980). Recall Elections since 1974, Legislative Research, Oregon Legislature, Salem, Oregon. [https://ccrls.ent.sirsi.net/client/en\\_US/oslpublic/search/detailnonmodal/ent:\\$002f\\$002fSD\\_ILS\\$002f0\\$002fSD\\_ILS:745492/ada?qu=AUTHOR%3Dhouser%2C+john&qu=SUBJECT%3Delections&d=ent%3A%2F%2FSD\\_ILS%2F0%2FSD\\_ILS%3A745492%7EILS%7E0&h=3](https://ccrls.ent.sirsi.net/client/en_US/oslpublic/search/detailnonmodal/ent:$002f$002fSD_ILS$002f0$002fSD_ILS:745492/ada?qu=AUTHOR%3Dhouser%2C+john&qu=SUBJECT%3Delections&d=ent%3A%2F%2FSD_ILS%2F0%2FSD_ILS%3A745492%7EILS%7E0&h=3)

Roberts, B. (2011). Up the Capitol Steps: A Woman's March to the Governorship, Oregon State University Press. <https://osupress.oregonstate.edu/book/up-capitol-steps>

Spivak, J. (08/24/2021). Recall Elections: From Alexander Hamilton to Gavin Newsom, independently published. <https://www.amazon.com/Recall-Elections-Alexander-Hamilton-Newsom/dp/B09DJ1BWN8>



## News Articles

Note: Articles generally are available on microfilm, which readers may be able to order through their local library, or via the ProQuest database available through some libraries, including for the City of Salem, Oregon.

Bender, D. (1999, May 19). Voters oust mayor in sled dispute. Statesman Journal, C.1.

Hunsberger, S. (1999, May 20). Small towns fertile fields for recalls. Statesman Journal, A.1.

Law, S. (2003, October 05). Oregon has seen many recall drives. Statesman Journal, A.1.

O'Brien, K. (1999, May 18). Sledding leads to recall attempt. Statesman Journal, C.1.

Opinion (2000, April 02). Recalls can be misused. Statesman Journal, C.8.

VanderHart, D. (2023, September 21). Accusations against Ore. Political operative add intrigue to recall of Eugene lawmaker. Statesman Journal, A.3.

VanderHart, D. (2023, Oct.4, 6:13am) Eugene voters reject recall against state Rep. Holvey in resounding fashion. Oregon Public Broadcasting.

<https://www.opb.org/article/2023/10/04/eugene-voters-reject-union-recall-attempt-representative-paul-holvey-democrat/>

## Miscellaneous

LWV of Colorado, past legislative reports.

[https://www.lwvcolorado.org/content.aspx?page\\_id=22&club\\_id=314195&module\\_id=614101](https://www.lwvcolorado.org/content.aspx?page_id=22&club_id=314195&module_id=614101)

Oregon State Bar Bulletin (November 2003). Letter to Editor, Recalling the Recall.

<https://www.osbar.org/publications/bulletin/03nov/letters.html>

International Foundation for Electoral Systems (March 2024). Voter education & outreach.

<https://www.ifes.org/our-expertise/election-integrity/voter-education-outreach>

For further reading and research

Osborne-Klein, J. (2004) Electoral Recall in Washington State and California: California Needs Stricter Standards to Protect Elected Officials from Harassment. Seattle Law Review Vol. 28. 145-172. <https://digitalcommons.law.seattleu.edu/sulr/vol28/iss1/4/>

Recall elections in New Jersey - citizen safety valve or empty threat? (2023) N.J. Election Law Enforcement Commission White Paper No. 30.

<https://www.elec.nj.gov/pdf/whitepapers/white30.pdf>

Digital and physical archives at the Oregon State Archives and State Library of Oregon

References for charts, pages 16-18, include the following (circa June 2024).

<https://www.justia.com/>

<https://law.lis.virginia.gov/>  
<https://code.dccouncil.gov/us/dc/council/code/sections/1-1001.17>  
[https://ballotpedia.org/Recall\\_\(political\)](https://ballotpedia.org/Recall_(political))  
<https://www.kslegislature.org/>  
<https://www.revisor.mn.gov/statutes/cite/211C/full#stat.211C.02>  
<https://www.ncsl.org/elections-and-campaigns/recall-of-state-officials>

## Image sources

Recall Timeline:

1908: Oregon State Capitol, Salem, Oregon, ca 1915

<https://www.salemhistory.net/digital/collection/specialcol/id/2434/rec/2>

Oregon Historic Photographs Collections

1917: Image of students in a classroom

source: <https://www.salemhistory.net/digital/collection/max/id/1332/rec/1>

from the Ben Maxwell Collection photo ID 4076

Title: Classroom in old Eola School in Eola, Polk County, Oregon, 1930's

Oregon Historic Photo Collection, Willamette Heritage Center, Salem, OR

1926: Image of man placing ballot in box

source: <https://www.salemhistory.net/digital/collection/max/id/1751/rec/1>

from the Ben Maxwell Collection photo ID 438

Title: Senator Charles McNary votes in Salem, Oregon, 1940

Oregon Historic Photo Collection, Willamette Heritage Center, Salem, OR

2015: Voters, don't abuse our democracy. Statesman Journal, Page D3, September 13, 2015.

Microfilm, Statesman Journal Archives.

<https://statesmanjournal.newspapers.com/image/127614008/?match=1&terms=democracy>

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